

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**972 IRREVOCABLE TRUST and
INTERMED GAS PRODUCTS, LLC,**

Plaintiffs

v.

**MICHAEL LAING, ROBERTA PUGLIESE,
LAING HOLDINGS CORPORATION and
INTERACTIVE MEDICAL TECHNOLOGIES, CORP.
Defendants.**

**Case No.: 08-CIV-4907 (RPP)
Magistrate Judge: (HP)**

ECF CASE

**AFFIDAVIT OF ROBERTA PUGLIESE IN SUPPORT OF MOTION TO DISMISS OR,
IN THE ALTERNATIVE, TO TRANSFER VENUE**

**STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)**

BEFORE ME, the undersigned authority, personally appeared Roberta Pugliese, who after being duly sworn, states:

1. My name is Roberta Pugliese, and I am currently President and the sole shareholder for Interactive Medical Technologies, Corp. ("IMT"), a Defendant in the above captioned matter. I am also a Defendant, individually, in the above captioned matter. I make this affidavit in support of Defendants Motion to Dismiss or in the Alternative, Motion to Transfer Venue on behalf of myself individually and on behalf of IMT.

2. I am personally familiar with the facts stated herein, which are true and correct and based upon my personal knowledge.

3. I currently reside in Palm Beach County, Florida and IMT is a Florida Corporation whose principal place of business is located in Palm Beach County, Florida.

RP

4. I have lived in Florida since 1974 and IMT has been a Florida Corporation since its inception in 2007.

5. I do not now and have not resided in the State of New York since 1974.

6. I, nor does IMT regularly, persistently or continuously engage in, conduct, carry on or solicit business within the State of New York. I nor does IMT own, lease, use possess or control any real property in the State of New York, nor does IMT or myself maintain a mailing address or telephone number in the State of New York. I, nor does IMT have a bank account in the State of New York. I, nor does IMT maintain an office or place of business in the State of New York.

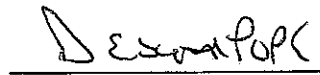
7. I, on behalf of myself or IMT have never traveled to New York to negotiate, discuss, obtain legal advice or engage in any conduct in connection with IMT.

8. I, on behalf of myself and IMT do not voluntarily consent to jurisdiction in the State of New York.

9. It is my belief that a significant amount of the relevant witnesses in this action including, but not limited to myself and Michael Laing are located in the State of Florida. However, Michael Laing would have greater knowledge as to the relevant witnesses and where they may reside.


ROBERTA PUGLIESE

Sworn to me this
3rd day of June, 2008


Notary Public

